



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DG/SSS/GMM
F. #2016R02185

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 26, 2019

By Hand and ECF

The Honorable Kiyo A. Matsumoto
United States District Judge
United States District Court
Eastern District of New York
Brooklyn, NY 11201

Re: United States v. Donville Inniss
Criminal Docket No. 18-134 (S-2)(KAM)

Dear Judge Matsumoto:

The government respectfully submits this letter in response to the Court's September 11, 2019 Memorandum and Order (the "Order") granting the government's motion to take a Rule 15 deposition of a witness (the "Witness") who is located in Barbados. (Dkt. No. 70).¹ In the Order, the Court ordered the parties to meet and confer with regard to a proposed date and means for the deposition, and to file a proposed order regarding the deposition. (Id. at 7). The government has endeavored to secure the Witness's attendance at a deposition but, to date, has not been able to do so. In the event that circumstances change such that the authorized

¹ To protect the Witness's privacy, the government redacted the Witness's name in its filings on the public docket. (Dkt. Nos. 62, 67, 69). The Court also did not include the Witness's name in its Order. (Dkt. No. 70 at 1, n.1).

deposition can proceed, the government will promptly notify the Court and submit a proposed order for the Court's consideration.

Respectfully submitted,

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cc: Anthony Ricco, Esq., and Steven Legon, Esq. (by ECF)